UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

In the Matter of the Criminal Complaint Against:
Republic of Georgia ("Georgian Authorities"), Kingdom of Denmark ("Denmark"), Tbilisi-based Organized Group ("Kordzakhia Crime Cell"), and Tea Tsulukiani, **Accused.**

Case No.: 1:25-cv-02152

COMES NOW Simon Chikhladze, the Complainant, appearing pro se, and respectfully submits this Criminal Complaint under penalty of perjury, and states as follows:

CRIMINAL PRIVATE COMPLAINT

1. INTRODUCTION

This is a criminal private complaint submitted by **Simon Chikhladze**, a United States asylum seeker, alleging that the named individuals and entities have committed offenses that constitute violations of **U.S. criminal law**, **international treaties**, and **human rights conventions**.

The complaint seeks formal investigation and prosecution for the following criminal offenses, including but not limited to:

- **Torture** (18 U.S.C. § 2340A)
- **Unlawful Surveillance and Wiretapping** (18 U.S.C. § 2511)
- **Obstruction of Justice** (18 U.S.C. § 1505)
- **Conspiracy Against Rights** (18 U.S.C. § 241)
- **Human Trafficking and Involuntary Servitude** (18 U.S.C. § 1589)
- **Extraordinary Rendition / Kidnapping Across Borders** (18 U.S.C. §§ 1201, 956)

2. JURISDICTION

Jurisdiction is proper in this District under:

- 18 U.S.C. § 3231 – Federal jurisdiction over offenses against the laws of the United States.

- The principle of **extraterritorial jurisdiction** under 18 U.S.C. § 2340A (Torture) and § 1203 (Hostage Taking), which applies to offenses committed outside the United States by foreign officials or agents where the victim is a U.S. national or person under U.S. protection.

3. PARTIES

Complainant:
Simon Chikhladze, a U.S. asylum seeker and Soviet defector, residing temporarily in Tbilisi, Georgia.

Accused:

- **Republic of Georgia** – As a foreign power facilitating or acquiescing in torture, surveillance, and human rights abuses.
- **Kingdom of Denmark** – For actions aiding and abetting extraordinary rendition in violation of international treaties.
- **Kordzakhia Crime Cell** – An organized group operating in Georgia under state protection or direction, targeting Plaintiff through illegal means.
- **Tea Tsulukiani** – Personally involved in organizing or facilitating torture and targeted abuse.

4. FACTUAL BASIS FOR CRIMINAL ALLEGATIONS

4.1 Torture (18 U.S.C. § 2340A)

- Complainant was subjected to **electromagnetic torture** using a custom device in Georgia.
- The torture was **systematic**, inflicted intentionally, and carried out by or with consent of state actors.

4.2 Unlawful Surveillance and Wiretapping (18 U.S.C. § 2511)

- Complainant's communications with the U.S. courts were intercepted and blocked without warrant or authorization.
- The interception occurred via compromised email servers and targeted internet access.

4.3 Obstruction of Justice (18 U.S.C. § 1505)

- Blocking of PACER access and interception of U.S. court filings.
- Interference with Plaintiff's right to seek legal redress and participate in legal proceedings.

4.4 Conspiracy Against Rights (18 U.S.C. § 241)

- Accused conspired to deny Complainant rights under the U.S. Constitution, including asylum, legal access, and protection from torture.

4.5 Human Trafficking / Involuntary Servitude (18 U.S.C. §§ 1589–1590)

- Complainant was forcibly moved across borders without consent.
- Subjected to degrading, forced, or involuntary living conditions and denial of freedom.

5. REQUEST FOR ACTION

The Complainant respectfully requests that:

1. **The U.S. Attorney's Office for the District of Columbia** investigate and prosecute the above-named accused under applicable federal criminal statutes.

2. The matter be referred to the **FBI**, **Department of Justice Human Rights and Special Prosecutions Section**, and other relevant agencies.

3. A U.S. grand jury be convened to assess the facts and determine indictment.

4. If applicable, a **warrant for arrest** be issued under Rule 4 of the Federal Rules of Criminal Procedure.

5. The Department of State initiates a **diplomatic protest or action** regarding violations by foreign sovereigns and facilitates safe relocation of the Plaintiff under humanitarian or witness protection provisions.

6. DECLARATION

I, **Simon Chikhladze**, under penalty of perjury, affirm that the foregoing allegations are true and correct to the best of my knowledge and belief.

Signed this 14th day of July, 2025.
Tbilisi, Georgia.

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